

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CASE No. 1:20-CV-11889-MLW

Dr. SHIVA AYYADURAI )

Plaintiff, )

v. )

WILLIAM FRANCIS GALVIN, )

MICHELLE K. TASSINARI, )

DEBRA O'MALLEY, )

AMY COHEN, )

NATIONAL ASSOCIATION OF )

STATE ELECTION DIRECTORS, )

TWITTER, INC., )

all in their individual capacities, and )

WILLIAM FRANCIS GALVIN, )

in his official capacity as Secretary )

of State for Massachusetts, )

Defendants. )

JURY DEMANDED

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In response to the Court's Order of June 16, 2021, Dkt. 149 - that the Plaintiff shall file a description of the discovery he will seek if he amends the Complaint and the Amended Complaint is not dismissed - and subject to alteration upon further exposure of facts, the Plaintiff describes the sought discovery as follows:

- All documents concerning:
  - the Plaintiff;
  - the drafts of the "Playbooks"
  - the drafts of the Long Fuse Report;
  - the Trusted Twitter Partnership;
  - communication between the Massachusetts Defendants and Twitter;
  - "election disinformation".

- All documents concerning the Partnership
- Communications between Tassinari, Cohen and Charles Stewart

/s/ Timothy Cornell

Timothy Cornell BBO 654412

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